

BRUCE C. YOUNG, ESQ., Bar #5560  
CRYSTAL J. HERRERA, ESQ., Bar #12396  
LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway, Suite 300  
Las Vegas, NV 89169-5937  
Telephone: 702.862.8800  
Fax No.: 702.862.8811

Attorneys for Defendant,  
HARMON MEDICAL REHABILITATION

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

WILLIAMS, KRYSTAL,  
Plaintiff,

vs.

HARMON MEDICAL  
REHABILITATION a THI of NV  
Corporation,  
Defendant.

Case No. 2:13-cv-02332-RJC-NJK

**STIPULATION AND ORDER TO DISMISS  
ENTIRE ACTION WITH PREJUDICE**

**STIPULATION AND ORDER TO DISMISS ENTIRE ACTION WITH PREJUDICE**

Plaintiff Krystal Williams ("Plaintiff"), in proper person, and Defendant Harmon Medical Rehabilitation ("Defendant"), more correctly identified as THI of Nevada at Las Vegas I, LLC dba Harmon Medical and Rehabilitation Center, by and through its counsel of record, do hereby stipulate and respectfully request the Court order that this matter, Case No. 2:13-cv-02332-RJC-NJK, be dismissed with prejudice.

...

...

...

1 Each party shall bear its own costs and fees incurred in this dispute.

2 Dated: October 7, 2015

Dated: October 8, 2015

3 Respectfully submitted,

Respectfully submitted,

4 krystal williams

/s/ Crystal J. Herrera

5 KRYSTAL WILLIAMS

BRUCE C. YOUNG, ESQ.  
CRYSTAL J. HERRERA, ESQ.  
LITTLER MENDELSON, P.C.

6 Pro Se Plaintiff

Attorneys for Defendant,  
HARMON MEDICAL REHABILITATION

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10 **ORDER**

11 **IT IS SO ORDERED.**

12 Dated: October 9, 2015.

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UNITED STATES DISTRICT JUDGE

BRUCE C. YOUNG, ESQ., Bar #5560  
CRYSTAL J. HERRERA, ESQ., Bar #12396  
LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway, Suite 300  
Las Vegas, NV 89169-5937  
Telephone: 702.862.8800  
Fax No.: 702.862.8811

Attorneys for Defendant,  
HARMON MEDICAL REHABILITATION

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

WILLIAMS, KRYSTAL,  
Plaintiff,

vs.

HARMON MEDICAL  
REHABILITATION a THI of NV  
Corporation,  
Defendant.

Case No. 2:13-cv-02332-RJC-NJK

**DECLARATION OF CRYSTAL J.  
HERRERA IN SUPPORT OF  
STIPULATION AND ORDER TO DISMISS  
ENTIRE CASE WITH PREJUDICE**

Crystal J. Herrera, hereby deposes and says as follows:

1. I am over eighteen years of age and have personal knowledge of the matters set forth in this Declaration, except as to the matters stated upon information and belief, and as to those matters, I believe them to be true. I could and would competently testify about the information that this Declaration contains.

2. I am an attorney duly licensed to practice law in Nevada; I am an associate at Littler Mendelson, P.C., which firm represents Defendant THI of Nevada at Las Vegas I, LLC dba Harmon Medical and Rehabilitation Center ("Defendant") in the above-captioned matter.

3. On September 2, 2015, Plaintiff sent me a message via email presumably implying that she no longer wished to proceed with this case. Plaintiff also demanded that funds that were taken out of her account be returned to her. See Plaintiff's email dated September 2, 2015, attached

1 hereto as **Exhibit "A."**

2 4. A few minutes later, on September 2, 2015, Plaintiff sent me a subsequent email  
3 advising me to please disregard her last email. *See* Plaintiff's email dated September 2, 2015,  
4 attached hereto as **Exhibit "B."** As best as I could determine from this exchange, Plaintiff's first  
5 email had been sent to me in error. Indeed, Littler Mendelson had no access to Plaintiff's funds and  
6 I am not unaware of Defendant Harmon having access to or taking any funds from Plaintiff.

7 5. I responded to Plaintiff's two email correspondences that same day. I informed  
8 Plaintiff that in the event she was no longer interested in pursuing this case and it was her desire and  
9 intention to dismiss this case, I was attaching a stipulation and order to dismiss this case with  
10 prejudice for her review and signature. *See* Defense counsel's email dated September 2, 2015 with  
11 attachment, attached hereto as **Exhibit "C."**

12 6. Plaintiff did not respond to my September 2, 2015 email.

13 7. On October 6, 2015, I received a message from Plaintiff via email stating that she  
14 "[did] not want to continue in this matter." She stated, among other things, that she felt like she was  
15 wasting her time and appears to have requested that we submit her email to the court and that she  
16 would send a copy of the email to the court as well. *See* Plaintiff's email dated October 6, 2015,  
17 attached hereto as **Exhibit "D."**

18 8. I responded to Plaintiff's email correspondence that same day. Once again, I  
19 informed Plaintiff that in the event she was no longer interested in pursuing this case and it was her  
20 desire and intention to dismiss this case, I was attaching a stipulation and order to dismiss this case  
21 with prejudice to the email for her review and signature. The stipulation and order had blanks for  
22 the date of signature and was blank on the signature lines. *See* Defense counsel's email dated  
23 October 6, 2015 with attachment, attached hereto as **Exhibit "E."**

24 9. On October 7, 2015, Plaintiff sent me an email returning the stipulation and order to  
25 dismiss this case with prejudice with a "7" entered into the empty date line and the name "Krystal  
26 Williams" typed into her signature line. *See* Plaintiff's email dated October 7, 2015 with attachment,  
27 attached hereto as **Exhibit "F."**

28 . . .

1           10. Defendant is filing Plaintiff's returned stipulation and order to dismiss with defense  
2 counsel's signature. This Declaration is submitted in an overabundance of caution in support of the  
3 stipulation and order to dismiss, given that Plaintiff is representing herself in proper person.

4           11. I hereby declare under penalty of perjury under the laws of the United States and the  
5 State of Nevada that the forgoing is true and correct to the best of my knowledge.

6           DATED this 8 day of October, 2015.

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CRYSTAL J. HERRERA

# EXHIBIT A

# EXHIBIT A

---

**From:** Krystal Williams <krystalwlms9@gmail.com>  
**Sent:** Wednesday, September 02, 2015 8:04 AM  
**To:** Herrera, Crystal J.  
**Subject:** Re: RE: Fwd:

Hello I received a message that you took funds out of my account. I am not sure why you guys did this. I have to pay my rent today and I have no money in my account. Please give me back my money. At this point if I have to give you money I do not wish to go fort with this case. Please give me my rent money . As I do not want to go forward in this case. This case has already caused me emotional distress and and can not function at work. Please let me know what I can do as of now thanks!

Sent from my iPhone

On Aug 19, 2015, at 17:39, Herrera, Crystal J. <[CHerrera@littler.com](mailto:CHerrera@littler.com)> wrote:

Ms. Williams—

We received your word attachment in the email below that appears to be in response to Defendant's First Set of Interrogatories. However, we have not received your responses to Defendant's First Set of Requests for Production of Documents. Please let us know if the same are in the mail or if you plan to respond to these Requests. Thank you.

**Crystal J. Herrera**, Associate  
702 862.7754 direct 702 920 8341 fax [CHerrera@littler.com](mailto:CHerrera@littler.com)  
3960 Howard Hughes Parkway, Suite 300 | Las Vegas, NV 89169-5937

<image001.jpg> | littler.com  
Employment & Labor Law Solutions Worldwide

**From:** Krystal Williams [<mailto:krystalwlms9@gmail.com>]  
**Sent:** Tuesday, August 11, 2015 10:36 AM  
**To:** Herrera, Crystal J.  
**Subject:** Fwd:

Sent from my iPhone

Begin forwarded message:

**From:** "Williams, Krystal B." <[Krystal.Williams@va.gov](mailto:Krystal.Williams@va.gov)>  
**Date:** August 11, 2015 at 10:33:23 PDT  
**To:** "[krystalwlms9@gmail.com](mailto:krystalwlms9@gmail.com)" <[krystalwlms9@gmail.com](mailto:krystalwlms9@gmail.com)>

*Krystal Williams, LPN*  
RHEUMATOLOGY CLINIC  
DEPARTMENT OF VETERANS AFFAIRS  
(702) 791-9000 ext 15748



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<Defendant\_s First Set of Requests for Production of Documents (133574294....pdf>



# EXHIBIT B

EXHIBIT B

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**From:** Krystal Williams <krystalwllms9@gmail.com>  
**Sent:** Wednesday, September 02, 2015 8:16 AM  
**To:** Herrera, Crystal J.  
**Subject:** Re: RE: Fwd:

Sorry disregard the last email

Sent from my iPhone

On Aug 19, 2015, at 17:39, Herrera, Crystal J. <CHerrera@littler.com> wrote:

Ms. Williams—

We received your word attachment in the email below that appears to be in response to Defendant's First Set of Interrogatories. However, we have not received your responses to Defendant's First Set of Requests for Production of Documents. Please let us know if the same are in the mail or if you plan to respond to these Requests. Thank you.

**Crystal J. Herrera, Associate**  
702.862.7754 direct 702.920.8341 fax CHerrera@littler.com  
3960 Howard Hughes Parkway, Suite 300 | Las Vegas, NV 89169-5937

<image001.jpg> | littler.com  
Employment & Labor Law Solutions Worldwide

**From:** Krystal Williams [mailto:krystalwllms9@gmail.com]  
**Sent:** Tuesday, August 11, 2015 10:36 AM  
**To:** Herrera, Crystal J.  
**Subject:** Fwd:

Sent from my iPhone

Begin forwarded message:

**From:** "Williams, Krystal B." <Krystal.Williams@va.gov>  
**Date:** August 11, 2015 at 10:33:23 PDT  
**To:** "krystalwllms9@gmail.com" <krystalwllms9@gmail.com>

*Krystal Williams, LPN*  
RHEUMATOLOGY CLINIC  
DEPARTMENT OF VETERANS AFFAIRS  
(702) 791-9000 ext 15748

---

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recipient(s). Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message.

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<Defendant\_s First Set of Requests for Production of Documents (133574294....pdf>

# EXHIBIT C

EXHIBIT C

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**From:** Herrera, Crystal J.  
**Sent:** Wednesday, September 02, 2015 10:37 AM  
**To:** KrystalWllms9@gmail.com  
**Cc:** Young, Bruce C.; Craig, Robyn  
**Subject:** RE: RE: Fwd:  
**Attachments:** Stipulation and Order to Dismiss.pdf

Ms. Williams—

I am in receipt of the email below and your subsequent email. In the event you are no longer interested in pursuing this case and it is your desire and intention to dismiss the case, I have attached a draft stipulation and order to dismiss this case with prejudice, for your review and signature.

Thank you,

**Crystal J. Herrera**, Associate  
702.862.7754 direct 702.920.8341 fax CHerrera@littler.com  
3960 Howard Hughes Parkway, Suite 300 | Las Vegas, NV 89169-5937

**Littler** | littler.com  
Employment & Labor Law Solutions Worldwide

**From:** Krystal Williams [mailto:krystalwllms9@gmail.com]  
**Sent:** Wednesday, September 02, 2015 8:04 AM  
**To:** Herrera, Crystal J.  
**Subject:** Re: RE: Fwd:

Hello I received a message that you took funds out of my account. I am not sure why you guys did this. I have to pay my rent today and I have no money in my account. Please give me back my money. At this point if I have to give you money I do not wish to go fort with this case. Please give me my rent money . As I do not want to go forward in this case. This case has already caused me emotional distress and and can not function at work. Please let me know what I can do as of now thanks!

Sent from my iPhone

On Aug 19, 2015, at 17:39, Herrera, Crystal J. <CHerrera@littler.com> wrote:

Ms. Williams—

We received your word attachment in the email below that appears to be in response to Defendant's First Set of Interrogatories. However, we have not received your responses to Defendant's First Set of Requests for Production of Documents. Please let us know if the same are in the mail or if you plan to respond to these Requests. Thank you.

**Crystal J. Herrera**, Associate  
702.862.7754 direct 702.920.8341 fax CHerrera@littler.com  
3960 Howard Hughes Parkway, Suite 300 | Las Vegas, NV 89169-5937

<image001.jpg> | littler.com  
Employment & Labor Law Solutions Worldwide

**From:** Krystal Williams [mailto:krystalwlms9@gmail.com]  
**Sent:** Tuesday, August 11, 2015 10:36 AM  
**To:** Herrera, Crystal J.  
**Subject:** Fwd:

Sent from my iPhone

Begin forwarded message:

**From:** "Williams, Krystal B." <Krystal.Williams@va.gov>  
**Date:** August 11, 2015 at 10:33:23 PDT  
**To:** "krystalwlms9@gmail.com" <krystalwlms9@gmail.com>

*Krystal Williams, LPN*  
RHEUMATOLOGY CLINIC  
DEPARTMENT OF VETERANS AFFAIRS  
(702) 791-9000 ext 15748

-----  
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<Defendant\_s First Set of Requests for Production of Documents (133574294....pdf)>

BRUCE C. YOUNG, ESQ., Bar #5560  
CRYSTAL J. HERRERA, ESQ., Bar #12396  
LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway, Suite 300  
Las Vegas, NV 89169-5937  
Telephone: 702.862.8800  
Fax No.: 702.862.8811

Attorneys for Defendant,  
HARMON MEDICAL REHABILITATION

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

WILLIAMS, KRYSTAL,  
Plaintiff,

vs.

HARMON MEDICAL  
REHABILITATION a THI of NV  
Corporation,  
Defendant.

Case No. 2:13-cv-02332-RJC-NJK

**STIPULATION AND ORDER TO DISMISS  
ENTIRE ACTION WITH PREJUDICE**

**STIPULATION AND ORDER TO DISMISS ENTIRE ACTION WITH PREJUDICE**

Plaintiff Krystal Williams ("Plaintiff"), in proper person, and Defendant Harmon Medical Rehabilitation ("Defendant"), more correctly identified as THI of Nevada at Las Vegas I, LLC dba Harmon Medical and Rehabilitation Center, by and through its respective counsel of record, do hereby stipulate and respectfully request the Court order that this matter, Case No. 2:13-cv-02332-RJC-NJK, be dismissed with prejudice.

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Each party shall bear its own costs and fees incurred in this dispute.

Dated: September 2, 2015

Dated: September 2, 2015

Respectfully submitted,

Respectfully submitted,

KRYSTAL WILLIAMS  
Pro Se Plaintiff

BRUCE C. YOUNG, ESQ.  
CRYSTAL J. HERRERA, ESQ.  
LITTLER MENDELSON, P.C.  
  
Attorneys for Defendant,  
HARMON MEDICAL REHABILITATION

**ORDER**

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2015.

UNITED STATES DISTRICT JUDGE

# EXHIBIT D

# EXHIBIT D

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**From:** Krystal Williams <krystalwllms9@gmail.com>  
**Sent:** Tuesday, October 06, 2015 4:53 PM  
**To:** Herrera, Crystal J.  
**Subject:** Court

I sent an email saying I do not want to continue in this matter. The court said I did not show up for a court day that I was unaware about. It seems as though nothing is moving forward and I'm wasting my time. At this time I do not want to be involved in this court matter . I have too much going on in my daily life. Please submit this to the courts and I will sent them a copy as well. Thank you

Sent from my iPhone

# EXHIBIT E

# EXHIBIT E

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**From:** Herrera, Crystal J.  
**Sent:** Tuesday, October 06, 2015 5:11 PM  
**To:** Krystal Williams  
**Cc:** Young, Bruce C.; Craig, Robyn  
**Subject:** RE: Court  
**Attachments:** SAO- Williams.pdf

Ms. Williams—

I am in receipt of the email below. In the event you are no longer interested in pursuing this case and it is your desire and intention to dismiss the case, I have attached a draft stipulation and order to dismiss this case with prejudice, for your review and signature.

Thank you,

Crystal J. Herrera, Associate  
702.862.7754 Direct 702.920.8341 Fax [CHerrera@littler.com](mailto:CHerrera@littler.com)  
3960 Howard Hughes Parkway, Suite 300, Las Vegas, NV 89169-5937

Littler Mendelson | [littler.com](http://littler.com)  
Employment & Labor Law Solutions Worldwide

-----Original Message-----

From: Krystal Williams [<mailto:krystalwlms9@gmail.com>]  
Sent: Tuesday, October 06, 2015 4:53 PM  
To: Herrera, Crystal J.  
Subject: Court

I sent an email saying I do not want to continue in this matter. The court said I did not show up for a court day that I was unaware about. It seems as though nothing is moving forward and I'm wasting my time. At this time I do not want to be involved in this court matter . I have too much going on in my daily life. Please submit this to the courts and I will sent them a copy as well. Thank you

Sent from my iPhone

1 BRUCE C. YOUNG, ESQ., Bar #5560  
2 CRYSTAL J. HERRERA, ESQ., Bar #12396  
3 LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway, Suite 300  
Las Vegas, NV 89169-5937  
Telephone: 702.862.8800  
4 Fax No.: 702.862.8811

5 Attorneys for Defendant,  
6 HARMON MEDICAL REHABILITATION

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 WILLIAMS, KRYSTAL,  
12 Plaintiff,

13 vs.

14 HARMON MEDICAL  
15 REHABILITATION a THI of NV  
Corporation,

16 Defendant.  
17

Case No. 2:13-cv-02332-RJC-NJK

**STIPULATION AND ORDER TO DISMISS  
ENTIRE ACTION WITH PREJUDICE**

18 **STIPULATION AND ORDER TO DISMISS ENTIRE ACTION WITH PREJUDICE**

19 Plaintiff Krystal Williams ("Plaintiff"), in proper person, and Defendant Harmon Medical  
20 Rehabilitation ("Defendant"), more correctly identified as THI of Nevada at Las Vegas I, LLC dba  
21 Harmon Medical and Rehabilitation Center, by and through its counsel of record, do hereby stipulate  
22 and respectfully request the Court order that this matter, Case No. 2:13-cv-02332-RJC-NJK, be  
23 dismissed with prejudice.

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Each party shall bear its own costs and fees incurred in this dispute.

Dated: October \_\_, 2015

Dated: October \_\_, 2015

Respectfully submitted,

Respectfully submitted,

---

KRYSTAL WILLIAMS

Pro Se Plaintiff

---

BRUCE C. YOUNG, ESQ.  
CRYSTAL J. HERRERA, ESQ.  
LITTLER MENDELSON, P.C.

Attorneys for Defendant,  
HARMON MEDICAL REHABILITATION

**ORDER**

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2015.

---

UNITED STATES DISTRICT JUDGE



# EXHIBIT F

# EXHIBIT F

---

**From:** Williams, Krystal B. <Krystal.Williams@va.gov>  
**Sent:** Wednesday, October 07, 2015 11:59 AM  
**To:** Herrera, Crystal J.  
**Attachments:** SAO- Williams.pdf

1 BRUCE C. YOUNG, ESQ., Bar #5560  
CRYSTAL J. HERRERA, ESQ., Bar #12396  
2 LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway, Suite 300  
3 Las Vegas, NV 89169-5937  
Telephone: 702.862.8800  
4 Fax No.: 702.862.8811

5 Attorneys for Defendant,  
6 HARMON MEDICAL REHABILITATION

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 WILLIAMS, KRYSTAL,  
12 Plaintiff,

Case No. 2:13-cv-02332-RJC-NJK

13 vs.

**STIPULATION AND ORDER TO DISMISS  
ENTIRE ACTION WITH PREJUDICE**

14 HARMON MEDICAL  
REHABILITATION a THI of NV  
15 Corporation,  
16 Defendant.

17  
18 **STIPULATION AND ORDER TO DISMISS ENTIRE ACTION WITH PREJUDICE**

19 Plaintiff Krystal Williams ("Plaintiff"), in proper person, and Defendant Harmon Medical  
20 Rehabilitation ("Defendant"), more correctly identified as THI of Nevada at Las Vegas I, LLC dba  
21 Harmon Medical and Rehabilitation Center, by and through its counsel of record, do hereby stipulate  
22 and respectfully request the Court order that this matter, Case No. 2:13-cv-02332-RJC-NJK, be  
23 dismissed with prejudice.

24 ...

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26 ...

Each party shall bear its own costs and fees incurred in this dispute.

Dated: October 7, 2015

Dated: October 7, 2015

Respectfully submitted,

Respectfully submitted,

krystal williams

KRYSTAL WILLIAMS

Pro Se Plaintiff

BRUCE C. YOUNG, ESQ.  
CRYSTAL J. HERRERA, ESQ.  
LITTLER MENDELSON, P.C.

Attorneys for Defendant,  
HARMON MEDICAL REHABILITATION

**ORDER**

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2015.

UNITED STATES DISTRICT JUDGE